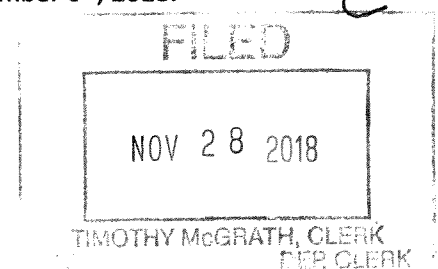


ALLEN WINDRIM, Pro Se	:	UNITED STATES BANKRUPTCY COURT
Debtor	:	EASTERN DISTRICT OF PENNSYLVANIA
	:	
	:	
	:	Bankruptcy No. 18-16016JKF
	:	Chapter 13
	:	

ANSWER TO TRUSTEE'S MOTION TO DISMISS

AND NOW, comes Debtor, Allen Windrim, and files the within Answer's and allege as follows:

1. Debtor, Allen Windrim, filed a Motion with the Court of Common Pleas, Philadelphia County, on the 24th October 2018, to stop the sheriff sale listed for the auction on November, 6th, 2018; the court scheduled a hearing for the same date, and one half an hour before the meeting of the creditors.
2. Debtor, Allen Windrim, emailed the trustee's office by sending an email to: ecfemail@FredReigleCh13.com and received a rejection email.
3. Debtor, Allen Windrim, faxed the same to the trustee's office and received a confirmation that the fax was successfully sent.
4. Debtor, Allen Windrim, did send a copy of the request to change/postpone/continue the meeting of the creditors for another date and time in the near future as seen appropriate by the trustee.
5. Debtor, Allen Windrim, did fail to follow-up with the trustee's office after the fax was sent and letter was sent, not at all deliberate or intentional; merely a mistake, but is taking ownership of the mistake.
6. Debtor, Allen Windrim, did speak to the trustee's office on November 5th, 2018 and was told to fax a letter to the trustee's office; and the letter was completed and faxed on November, 6th, 2018.
7. Debtor, Allen Windrim, received a copy of the Motion filed before this honorable court and immediately called and left a message for Polly Langdon, at the telephone number provided in the Motion received.
8. Debtor, Allen Windrim, received a call back from Barbara, a staff member of the trustee's office and was informed that their office was not in receipt of my faxed letter from November 6th, 2018.



9. Debtor, Allen Windrim, received instruction from Barbara, a staff member of the trustee's office to send another email and Debtor, was also provided instructions that it would be the Debtor's sole responsibility to notify all creditors of the new meeting of the creditors date and time.
10. Debtor, Allen Windrim, sent the email as instruction to ecfemail@FredReigleCh13.com and received another rejection email, as previous; and secondary email to Info@ReadingCh13.com and has not received a reply as of the date of the mailing of this Motion response.
11. Debtor, Allen Windrim, will submit, at the time of the hearing, all related documents, fax confirmation pages, email rejection's, etc., all related to the Motion in question; only at the hearing, because Debtor is not skilled, knowledgeable or prepared to ask or submit documents, under seal, because of private, non-public information contained within these documents.

WHEREFORE, Debtor, Allen Windrim, respectfully requests that this Honorable Court enter an Order in response to the Debtor's Motion for:

(1) A new hearing date and time for the meeting of the creditors;

- and -

(2) Not dismissing Debtor's current case;

- and -

(3) Denying Trustee's Motion To Dismiss Pursuant to 11 U.S.C. Section 1307

Respectfully Submitted:

/s/: Allen Windrim
Allen Windrim, Pro Se,
Debtor

Dated: 16th November 2018

ALLEN WINDRIM, Pro Se	:	UNITED STATES BANKRUPTCY COURT
Debtor	:	EASTERN DISTRICT OF PENNSYLVANIA
	:	
	:	
	:	Bankruptcy No. 18-16016JKF
	:	Chapter 13

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Answer To Trustee's Motion To Dismiss, were served on this 16th day of November, 2018, by first class mail upon those listed below:

U.S. Bankruptcy Court
Clerk's Office
United States Courthouse
900 Market Street
Philadelphia, PA 19107
&
Polly Langdon, Esq.
for William Miller, Esq.
Interim Chapter 13 Trustee
2901 St. Lawrence Avenue, Suite 100
Reading, PA 19606

/s/: Allen Windrim
Allen Windrim, Pro Se,
Debtor

Dated: 16th November 2018